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May 25, 2022

Robert Mims
Office of the US Attorney
900 Jefferson Avenue
Oxford, MS 38655
robert.mims@usdoj.gov

Re: United States of America v. Jamarr Smith, et al.
U.S.D.C. for the Northern Dist. of MS; Oxford Div.; No. 3:21-CR107-NBB-RP
Our File No.: 21-7126

Dear Robert:

Thank you for your prompt response to my previous discovery request. I am afraid I have one additional discovery request at this time.

1. As to Todd Matney, Inspector, U.S. Postal Inspection Service, please advise if he consulted with legal counsel before submitting the application for a search warrant on or about November 8, 2018.
2. As to Todd Matney, Inspector, U.S. Postal Inspection Service, please advise how many previous applications for a geofence search warrant he had presented to a Judge before November 8, 2018.
3. As to the applications for search warrant in the previous question, please state how many of those previous applications were approved and how many were rejected.
4. Please state whether Magistrate Judge Roy Percy read the application for search warrant, and if so, how long he took to read it.
5. As to Todd Matney, inspector, U.S. Postal Inspection Service, please state what training or instruction, if any, he received as to the scientific and/or technical basis for and purpose of geofence search warrants prior to November 8, 2018.

Exhibit "G"

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6. Please provide the policies, procedures and training consulted by or provided to Todd Matney, Inspector, U.S. Postal Inspection Service, before November 8, 2018 concerning geofence search warrants.
7. Please provide the template or form used by Todd Matney, Inspector, U.S. Postal Inspection Service, for the geofence search warrant application in this case.

I appreciate your attention to this matter.

Sincerely,

HICKMAN, GOZA & SPRAGINS, PLLC



GOODLOE T. LEWIS
GTL/mh